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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

KRISTY LYNN FELKINS,

Defendant.

CASE NO. 2:20-CR-00175-TLN

STIPULATION FOR EXTENSION OF TIME FOR
STATUS CONFERENCE AND EXCLUSION OF
TIME

DATE: November 12, 2020
TIME: 9:30 a.m.
COURT: Hon. Troy L. Nunley

Plaintiff United States of America, by and through its attorney of record, Assistant United States Attorney GRANT B. RABENN, and defendant KRISTY LYNN FELKINS, both individually and by and through her counsel of record, LINDA C. ALLISON and HANNAH R. LABAREE, hereby stipulate as follows:

1. The Indictment in this case was filed on September 25, 2020, and defendant first appeared before a judicial officer of the Court in which the charges in this case were pending on September 30, 2020. By previous order, this matter was set for status on November 12, 2020 at 9:30 a.m.

2. By this stipulation, defendant now moves to continue the status conference until February 25, 2021, and to exclude time between November 12, 2020, and February 25, 2021, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

1 a) The government has represented that the discovery associated with this case
2 includes reports and related documents constituting hundreds of pages of discovery. All of this
3 discovery has been either produced directly to counsel and/or made available for inspection and
4 copying.

5 b) Counsel for defendant desires additional time to consult with her client, to review
6 the current charges, conduct investigation and research related to the charges, to review and copy
7 discovery, and discuss potential resolution with the client.

8 c) Counsel for defendant believes that failure to grant the above-requested
9 continuance would deny him/her the reasonable time necessary for effective preparation, taking
10 into account the exercise of due diligence.

11 d) The government does not object to the continuance.

12 e) Based on the above-stated findings, the ends of justice served by continuing the
13 case as requested outweigh the interest of the public and the defendant in a trial within the
14 original date prescribed by the Speedy Trial Act.

15 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
16 et seq., within which trial must commence, the time period of November 12, 2020 to February
17 25, 2021, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local
18 Code T4] because it results from a continuance granted by the Court at defendant's request on
19 the basis of the Court's finding that the ends of justice served by taking such action outweigh the
20 best interest of the public and the defendant in a speedy trial.

21 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
22 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
23 must commence.

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26 IT IS SO STIPULATED.
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1 Dated: November 10, 2020

McGREGOR W. SCOTT
United States Attorney

2
3 /s/ GRANT B. RABENN
GRANT B. RABENN
Assistant United States Attorney

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5 Dated: November 10, 2020

6 /s/ LINDA C. ALLISON
LINDA C. ALLISON
Counsel for Defendant
KRISTY LYNN FELKINS

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9 **[PROPOSED] FINDINGS AND ORDER**

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11 IT IS SO FOUND AND ORDERED this ____ day of _____, ____.

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14 THE HONORABLE TROY L. NUNLEY
UNITED STATES DISTRICT JUDGE